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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

STEFANY HAZELETT,

Plaintiff,

vs.

WAL-MART STORES, INC., a Delaware
Corporation

Defendant.

Case No.: 3:17-cv-00274-MMD-CBC

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT
AND FOR DEFENDANT TO FILE
REPLY TO PLAINTIFF'S RESPONSE**

[FIRST REQUEST]

STIPULATION

It is hereby stipulated by and between the parties, through their respective counsel, that Plaintiff, STEFANY HAZELETT (hereinafter referred to as "Plaintiff") shall have an extension from Friday, March 1, 2019 to and including Friday, March 22, 2019, in which to file her Response to Defendant's Motion for Summary Judgment filed February 8, 2019. Additionally, the Defendants shall have an extension through and including April 12, 2019 (an extra week beyond the usual April 5, 2019 deadline) to respond to the Plaintiff's response. This stipulation is submitted and based upon the following:

1. That Plaintiff's counsel has requested this extension of time and has informed Defendants' counsel that such an extension is necessary because counsel for Plaintiff has been experiencing a heavy workload with numerous court and administrative

1 hearings, attending and/or giving testimony at legislative hearings and working on
2 lobbying efforts, written discovery, several depositions, Early Neutral Evaluation
3 Conferences, preparing for one trial that was scheduled for February 26, 2019 that
4 settled last week, and preparing for another trial set for April 1, 2019. As a result,
5 during the time since the Defendant filed the motion, Plaintiff's counsel has not had
6 sufficient time to respond to the Motion for Summary Judgment.

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8 2. Further, during the first week of April, when Defendant's reply is due, Defendant's
9 counsel is traveling for a firm training course. In addition, Defendant's counsel is
10 traveling with family the week prior, necessitating the one week extension on the
11 Reply.

12 3. The Parties are in agreement regarding the Plaintiff's request for a three week extension
13 to file her response to the Defendants' Motion for Summary Judgment. In the interests
14 of fairness and equity the Parties agree that the Defendants may have a corresponding
15 three week period (which is one extra week), to April 12, 2019, to reply to the Plaintiff's
16 response.

17
18 4. That this request for an extension of time for Plaintiff to file his Response to
19 Defendant's above referenced Motion for Summary Judgment, and the corresponding
20 extension for Defendants to respond to Plaintiff's Motion for Partial Summary
21 Judgment, is made in good faith and not for purpose of delay.

22 DATED this 1st day of March, 2019.

23 /s/ James P. Kemp
24 James P. Kemp, Esq.
25 Nevada Bar No. 6375
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/s/ Z. Kathryn Branson
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Attorneys for Defendant

ORDER

Good cause appearing, the above stipulation is approved. The Plaintiff shall have through and including March 22, 2019 to file her response to the Defendant's February 8, 2019 Motion for Summary Judgment. The Defendants shall have through and including April 12, 2019 to reply to Plaintiff's response.

IT IS SO ORDERED



U.S. DISTRICT COURT JUDGE

Dated: March 1, 2019